## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	) Case No.:2:15-mj-00664-GWF
Plaintiff,	) )
vs.	<ul><li>STIPULATION TO CONTINUE</li><li>BENCH TRIAL</li></ul>
JOSE JULIO GONZALES,	) (First Request)
Defendant.	, ) )

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Adam Vanderheyder, Esquire, counsel for defendant **JOSE JULIO GONZALES**, that the bench trial in the above-captioned matter, currently scheduled for February 3, 2016, at the hour of 9:00 a.m., be vacated and continued for sixty (60) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

- 1. The parties are in the process of negotiating a resolution of the case that would obviate the need for trial. The parties need additional time to do so.
  - 2. Defendant is out of federal custody and agrees to the continuance.

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1	3. Denial of this request for	r a trial continuance would prejudice both the	
2	Defendants and the Government and unne	ecessarily consume this Court's valuable resources	
3	taking into account the exercise of due diligence.		
4	4. Additionally, denial of this r	request for continuance could result in a miscarriage	
5	of justice.		
6	5. The additional time requeste	d by this stipulation, is excludable in computing the	
7	time within which the defendant must be in	dicted and the trial herein must commence pursuan	
8	to the Speedy Trial Act, 18 U.S.C. § 3161(	(b) and 3161(h)(8)(A), considering the factors under	
9	18 U.S.C. § 3161(h)(8)(B)(I) and (iv).		
10	6. This is the first request for co	ontinuance of the trial in this case.	
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12	DATED this 2nd day of February, 2016.		
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14		Respectfully submitted,	
15		DANIEL G. BOGDEN United States Attorney	
16	/s/ Adam Vander Heyder	/s/ Nadia Ahmed	
17	757 Adam Vander Heyder	7,5/, 2 (44-24)	
18	ADAM VANDERHEYDER, ESQ. Counsel for defendant	NADIA AHMED Special Assistant United States Attorney	
19	JOSE JULIO GONZALES		
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5	DISTRICT OF NEWADA		
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8	UNITED STATES OF AMERICA, )	Case No: 2:15-mj-00664-GWF	
9	Plaintiff,	ORDER CONTINUING	
10	vs.	BENCH TRIAL	
11	JOSE JULIO GONZALES,		
12	Defendant.		
13	Based on the pending stipulation of counsel, and good cause appearing therefore,:		
14	IT IS HEREBY ORDERED that the bench trial in the above-captioned matter currently scheduled for February 3, 2016, at the hour of 9:00 a.m., be vacated and continued to Wednesday, May 18, 2016, at the hour of 9:00 a.m.		
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18	On d		
19	DATED this 2nd	day of February, 2016.	
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21		TED STATES MAGISTRATE HIDGE	
22	UNI	TED STAYES MAGISTKATE JUDGE	
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